

John J. Sullivan
Kipp C. Leland
HILL RIVKINS & HAYDEN LLP
Attorneys for Plaintiffs
45 Broadway, Suite 1500
New York, New York 10006
(212) 669-0600

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
ERIDAN SHIPPING LTD., as successor in
interest to KAMA MALTA SHIPPING CO.
LTD., and ANTARUS SHIPPING CO. LTD.,
as successor in interest to KAMA MALTA
1011 SHIPPING CO. LTD.,

Index No. 07-Civ-6347 (HB)

Plaintiffs,

-against-

STANISLAV FILATOV

Defendant.
----- X

**NOTICE OF MOTION
FOR SUMMARY JUDGMENT
AND FOR ATTACHMENT OF ASSETS**

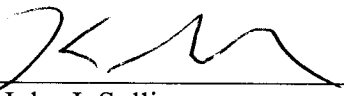
PLEASE TAKE NOTICE THAT upon the accompanying Memorandum of Law, the Clerk's Certificate of Default entered on the Defendant, the Affirmation of Dr. Jotham Scerri-Diacono, the Declaration of Kipp C. Leland, Esq., the Declaration Concerning Todor Vassilev's April 10, 2002 Affidavit, and the exhibits annexed thereto, and the prior pleadings herein, Plaintiffs will move this Court before the Honorable Harold A. Baer, United States District Judge, Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a time and place to be determined by the Court, for an order pursuant to the New York Uniform Foreign Money-Judgments Recognition Act, codified as NY CPLR § 5301 - §5309, and pursuant to the

New York common law of comity, granting recognition of a Judgment in favor of Plaintiffs and against Defendant issued by the First Hall of the Civil Court in Malta, Europe, and for attachment of assets belonging to Defendant, and for such other and further relief as the Court may deem just and proper.

Dated: September 18, 2007
New York, New York

HILL RIVKINS & HAYDEN LLP
Attorneys for Plaintiffs

By: _____


John J. Sullivan
Kipp C. Leland
45 Broadway, Suite 1500
New York, New York 10006
(212) 669-0600